

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

PAMELA BUTLER,)	
)	
Plaintiffs,)	
)	
vs.)	Case No. 4:18-cv-01701-AGF
)	
MALLINCKRODT LLC, et al.,)	Lead Case
)	
Defendants.)	

JOINT NOTICE REGARDING INDIVIDUAL DISCOVERY

Pursuant to item no. 4 of the Court’s Case Management Order No. 3 dated July 21, 2021 (Doc. #45), the parties provide this Joint Notice Regarding Individual Discovery.

Agreement to delay individual discovery until the resolution of common issues.

Case Management Order No. 3, item no. 4, ordered the parties to submit a “joint notice listing all outstanding individual discovery and a schedule for completing such discovery or, if the parties agree, a joint statement indicating that the parties wish to delay such individual discovery until after the resolution of common issues.”

The parties have agreed to delay individual discovery until after the resolution of common issues.

Dated: September 20, 2021

Respectfully submitted,

/s/ Jonathan Soper

Kenneth B. McClain #32430
kbm@hfmlegal.com
Jonathan M. Soper #61204
jms@hfmlegal.com
Colin W. McClain #64012
cwm@hfmlegal.com
221 W. Lexington, Suite 400
P.O. Box 900
Independence, Missouri 64050
(816) 836-5050
(816) 836-8966 FAX

ATTORNEYS FOR PLAINTIFFS

/s/ David R. Erickson

SHOOK, HARDY & BACON LLP
David R. Erickson, # 31532MO
Steven D. Soden, # 41917MO
Anthony R. Martinez, # 61791MO
2555 Grand Boulevard
Kansas City, MO 64108-2613
Telephone: 816.474.6550
Facsimile: 816.421.5547
derickson@shb.com
ssoden@shb.com
amartinez@shb.com

ATTORNEYS FOR DEFENDANT
MALLINCKRODT LLC

/s/ Brian O. Watson

Brian O. Watson, #68678MO
Jennifer Steeve, #308082CA
Lauren E. Jaffe, #6316795IL
RILEY SAFER HOLMES & CANCELIA LLP
70 W. Madison St., Ste. 2900
Chicago, Illinois 60602
(312) 471-8700 (main)
(312) 471-8701 (fax)
ecasmere@rshc-law.com
bwatson@rshc-law.com
jsteeve@rshc-law.com
ljaffe@rshc-law.com

ATTORNEYS FOR DEFENDANT
COTTER CORP. (N.S.L.)

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of September 2021, I electronically filed the above with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to counsel of record.

/s/ Brian O. Watson